REMARKS

Claims 1-35 are pending. Claims 1, 15 and 23 are currently amended. Claim 3 has been canceled.

Claims 1-6 and 8-14 were rejected under 35 U.S.C. §103(a) as being unpatentable over Aravamudan et al. (U.S. Patent No. 6,584,186) in view of Riefer et al. (U.S. Patent No. 6,421,727).

Claim 1 has been amended to incorporate the subject matter of claim 3. No new matter has been added. Claim 1 now recites dynamically removing a call service component from a call controller. Neither the Aravamudan et al. patent, the Riefer et al. patent nor any combination thereof discloses or suggests the features now recited in claim 1.

The Aravamudan et al. patent discloses a method of protecting the integrity of a communications network. *See* Title. The method includes establishing a call connection and monitoring the call connection for service requests, such as a call takedown request. *See* column 11, lines 23-48. In response to such requests, appropriate applets are run and service requests are issued to appropriate device servers. *See* column 11, lines 52-55. However, a simple call takedown does not amount to dynamically removing a call service component from a call controller, as recited in claim 1, because the call takedown does not include removing any call service components.

Moreover, the Aravamudan et al. patent explicitly discloses that the applets (*e.g.,* the applets that are run in a takedown request) can be located anywhere in the network and can be executed anywhere in the network. *See* column 7, lines 14-18. Since those applets can be executed anywhere in the network, there would have been no reason to think that a call takedown included dynamically removing those applets from anywhere. More particularly, there would have been no reason to think that a call takedown might include dynamically removing the applets from a call controller, as is recited in claim 1.

The Reifer et al. patent merely discloses a system for providing service activation to end-customers in a telecommunications system by downloading a JAVA application to a web

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browser. *See* column 9, lines 7-14 and FIG. 9. The Reifer patent does not, however, disclose or suggest dynamically removing the downloaded JAVA application.

Claim 1 should be allowable for at least the foregoing reasons.

Claims 2-6 and 8-14 depend from claim 1 and, therefore, should be allowable for at least the same reasons as claim 1.

Claims 15-19, 21-27 and 29-33 also were rejected under 35 U.S.C. §103(a) as being unpatentable over the Aravamudan et al. patent in view of Riefer et al. patent.

Claims 15 and 23 have been amended in a manner similar to claim 1.

Therefore, claims 15 and 23 should be allowable for at least the same reasons as claim 1.

Claims 16-19, 21, 22, 24-27 and 29-33 depend from claims that should be allowable for at least the reasons discussed above. Those claims (*i.e.,* 16-19, 21, 22, 24-27 and 29-33) should be allowable for at least the same reasons as the claims from which they respectively depend.

Claim 34 was rejected under 35 U.S.C. §103(a) as being unpatentable over the Reifer et al. patent in view of Guheen et al. (U.S. Patent No. 6,957,186).

Claim 34 recites dynamically removing a call service component from a call controller, when the call service component is no longer needed. For reasons that are discussed above in detail, the Reifer et al. patent neither discloses nor suggests that feature. Nor does the Guheen et al. patent disclose or suggest that feature.

Instead, the Guheen et al. patent discloses a method of identifying various components of a system for building, management and support purposes by displaying a pictorial representation of an existing organization along with a plurality of components. Column 2, lines 3-10. The Guheen does not, in any way, disclose or suggest dynamically removing a call service component from a call controller, when the call service component is no longer needed, as recited in claim 34.

Claim 34 should be allowable for at least the foregoing reasons.

Claim 35 was rejected under 35 U.S.C. §103(a) as being unpatentable over the Reifer et al. patent in view of the Guheen et al. patent.

Claim 35 recites a management system adapted to dynamically remove the service component when the call controller no longer requires the service component. For reasons similar to those discussed above with respect to claim 34, neither the Reifer et al. patent, nor the Guheen patent discloses or suggests that feature.

Claim 35 should be allowable for at least the foregoing reasons.

Claims 7, 20 and 28 were rejected under 35 U.S.C. §103(a) as being unpatentable over the Aravamudan et al. patent, in view of the Reifer et al. patent and further in view of Guheen et al. patent.

Claims 7, 20 and 28 depend from claims that recite dynamically removing a call service component from a call controller. For reasons similar to those discussed above, none of the cited references discloses or suggests that feature.

Claims 7, 20 and 28 should be allowable for at least the foregoing reasons.

35 U.S.C. 101 Rejections

The Office action also rejected claims 15-22 and 35 as being directed to non-statutory subject matter. In particular, the office action appears to consider the subject matter of those claims to be mere abstract, impractical ideas.

Those rejections are clearly improper since the subject matter of those claims is not merely abstract, impractical ideas. Instead, claims 15-22 are directed toward a telecommunication system and claim 35 is directed to a system. That certain aspects of the claimed systems might be implemented in software simply does not render the subject matter recited therein non-statutory.

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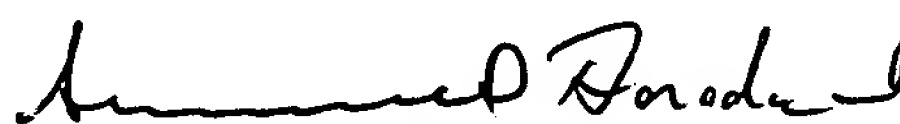Filed : April 25, 2001
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Accordingly, Applicants respectfully request reconsideration of this clearly improper rejection.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific rejection, issue or comment does not signify agreement with or concession of that rejection, issue or comment. In addition, because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

Enclosed is a $450 check for the Petition for Extension of Time fee. Please apply any other charges or credits to deposit account 06-1050.

Respectfully submitted,

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